

# Exhibit E

**Tenreiro, Jorge**

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**From:** Ceresney, Andrew J. <aceresney@debevoise.com>  
**Sent:** Monday, January 25, 2021 6:06 PM  
**To:** Tenreiro, Jorge  
**Cc:** Guo, Joy; Bliss, Dugan; Waxman, Daphna A.; Daniels, Jon; Kellogg, Michael K.; Figel, Reid M.; Zornberg, Lisa  
**Subject:** Re: Ripple SEC Conference

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Jorge:

Here are responses to your two questions. Happy to talk it through at your convenience.

1. What does the proposed discovery schedule look like after the Court rules on the first set of motions for summary judgment?

Our proposal is that we would pause discovery while the SJ motion(s) are being considered, and following decision on the motion(s), we would set a schedule for any additional discovery that may be required.

2. Without prejudice to moving on other issues (and understanding that you may not have written out the motion for summary judgment yet!), what legal issue(s) or cause(s) of action would you propose be resolved by this motion?

Our current thinking is that we would propose to move for SJ after the 4 months of discovery on the issue of whether XRP as currently distributed by Ripple is a "security" such that an injunction should issue.

Andrew Ceresney  
Partner  
Debevoise & Plimpton  
212-909-6947 (office)  
[REDACTED]

On Jan 25, 2021, at 3:27 PM, Tenreiro, Jorge <tenreiroj@sec.gov> wrote:

Hi Andrew:

Thanks for outlining your discovery proposal this morning. Could you clarify a couple of questions we have, so that we may better evaluate the proposal?

1. What does the proposed discovery schedule look like after the Court rules on the first set of motions for summary judgment?
2. Without prejudice to moving on other issues (and understanding that you may not have written out the motion for summary judgment yet!), what legal issue(s) or cause(s) of action would you propose be resolved by this motion?

We would welcome clarity on the above questions in order to get you a fulsome substantive response in the next day or so.

Talk soon,

Jorge

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**From:** Ceresney, Andrew J. <aceresney@debevoise.com>

**Sent:** Thursday, January 21, 2021 7:26 PM

**To:** Guo, Joy <jguo@debevoise.com>; Tenreiro, Jorge <tenreiroj@SEC.GOV>; Bliss, Dugan <BlissD@SEC.GOV>; Waxman, Daphna A. <WaxmanD@SEC.GOV>; Daniels, Jon <danielsj@SEC.GOV>; 'Flumenbaum, Martin' <mflumenbaum@paulweiss.com>; 'Bunting, Kristina' <kbunting@paulweiss.com>; 'Solomon, Matthew' <msolomon@cgsh.com>; 'Janghorbani, Alexander' <ajanghorbani@cgsh.com>; 'Kellogg, Michael K.' <mkellogg@kelloggghansen.com>; 'Figel, Reid M.' <rfigel@kelloggghansen.com>; Zornberg, Lisa <lzornberg@debevoise.com>

**Subject:** RE: Ripple SEC Conference

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Hi guys – does anyone object to starting this meeting at 830 rather than 9 am? If this is ok with everyone, we can change the invite.

-----Original Appointment-----

**From:** Guo, Joy

**Sent:** Tuesday, January 19, 2021 11:42

**To:** Guo, Joy; 'Tenreiro, Jorge'; 'BlissD@SEC.GOV'; 'Waxman, Daphna A.'; 'Daniels, Jon'; 'Flumenbaum, Martin'; 'Bunting, Kristina'; 'Solomon, Matthew'; 'Janghorbani, Alexander'; 'Kellogg, Michael K.'; 'Figel, Reid M.'; Ceresney, Andrew J.; Zornberg, Lisa

**Subject:** Ripple SEC Conference

**When:** Monday, January 25, 2021 9:00 AM-10:00 AM (UTC-05:00) Eastern Time (US & Canada).

**Where:** <https://debevoise.zoom.us/j/99089420438?pwd=REt2cG5JV1VnWTlvNE9kZIN6bjBZUT09>

Joy Guo is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting

<https://debevoise.zoom.us/j/99089420438?pwd=REt2cG5JV1VnWTlvNE9kZIN6bjBZUT09>

Meeting ID: 990 8942 0438

Passcode: 728962

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+1 346 248 7799 US (Houston)

+1 602 753 0140 US (Phoenix)

+1 669 219 2599 US (San Jose)

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213.19.144.110 (Amsterdam Netherlands)

213.244.140.110 (Germany)

103.122.166.55 (Australia)

209.9.211.110 (Hong Kong SAR)

64.211.144.160 (Brazil)

69.174.57.160 (Canada)

207.226.132.110 (Japan)

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